Response to Notice of Proposed Rule Making

MM Docket No. 93-48

Policies and Rules Concerning Children's Television Programming;

Revision of Programming Policies for Television Broadcast Stations

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Drs. Wright and Huston, professors at the University of Kansas, have conducted research on the influences of television on children for more than 20 years. The primary focus of most of that research is educational programming for young children. They have published over 60 articles, and they recently released the results of a major study showing the effects of viewing educational television on young children's school readiness [f1]. Dr. Huston is senior author of an award-winning book, Big World, Small Screen: The Role of Television in American Society [f2]. A list of publications and papers from CRITC is attached.

These comments first address the need for new rules to enforce the Children's Television Act by offering evidence that educational and informational television programs can make important contributions to young children's intellectual and social development.

We then offer comment on the following four issues in the Proposed Rule Making document: (a) improving the flow of information to the public; (b) the definition of educational programming; (c) the duration and format of programs, and (d) the need for a minimum time requirement.

Educational Television Enhances Children's Development

A large body of research has demonstrated that young children can learn academic skills, language, positive social behavior, imagination, and task persistence from well-designed educational programs. In several studies, children who watched Mr. Rogers' Neighborhood showed increases in helping, sharing, talking out problems, playing imaginatively (but nonviolently), and persisting at activities [f2, f3]. Early evaluations of Sesame Street showed that children from many parts of the country learned letters, numbers, concepts, and the like from viewing the program at home [f3]. Evaluations of programs for elementary school children, e.g., Freestyle, Fat Albert and the Cosby Kids, De Grassi Junior High also show positive effects on children's knowledge and attitudes.

We recently completed a longitudinal study following children from low and moderate income families over three years. They were tested annually, and their home viewing was monitored periodically throughout the 3-year period. Children who were frequent viewers of Sesame Street and other children's informative programs from ages 2 through 4 performed better on tests of vocabulary, school readiness, pre-reading, and math skills than infrequent viewers. These differences occurred even when children were equated for their initial language skill and for the qualities of their family and home environments [f1].

Television reaches children earlier and for more hours per day than any other educational influence except the family. Yet most of what is offered to children on commercial television does little to advance their development. Good children's television could make a contribution to the nation by helping our children to be better educated and better informed, but it is typically too expensive to be sustained by market forces.

Response to the Proposed Rule Making

A. Improving the Flow of Information to the Public

All of the suggested procedures appear useful, but we would suggest that information be provided on air by the station prior to the time the program is broadcast. It is common for stations to air promotions of future programs, and this practice persists because it is effective in building audiences. If stations are permitted to meet part of their

obligation by sponsoring programs on other outlets, they could be required to broadcast information about those programs, and their time, date, and channel of airing, as well. Such announcements would, of course have to originate with individual stations.

Information on a television station is likely to reach a larger audience than printed television guides or public files in television stations. It will be more effective particularly for adults and children in low-income and minority families. Surveys repeatedly show that low income families and many minority group members use television extensively and are more likely to use it for information than a newspaper [f5]. Moreover, it is especially likely to reach frequent viewers of that station who might be most likely to turn on its other offerings. Promotions for entertainment programs are designed primarily to attract an audience. The same technique might increase the attractiveness of educational programs for children, and, as a result, increase viewership.

B. Defining Educational Content

Age-specific. The criteria listed in the proposal omit one important feature. Educational and informational programming must be targeted for children in a relatively narrow age range so that its content can be appropriate to the developmental level of the intended audience. The current practice among many commercial producers is to define the child audience as ages 2 to 12. It is unlikely that a program can have educational or informative value for children across such a wide age range. We are not suggesting that the FCC identify a particular age range or that stations be required to cover all age ranges.

What we are suggesting is that the written description of the program specify the target age range and that it span no more than three or four years. Virtually all educational programs on public television identify an age range spanning three or four years at most (e.g. 3-5, 6-8, 9-11, 12-16). New information on viewing by children as young as 12 months suggests that the range from 1-3 might also be appropriate [f6]. Children in these age ranges differ dramatically in vocabulary, ability to comprehend media techniques, ability to understand connected sequences, interests, knowledge base, and so on. A program that is educational for a 4-year-old is not usually very useful for an 8-year-old. In our study of children from ages 2 to 7, for example, viewing Sesame Street and similar educational programs during the age period from 2 to 4 helped children to learn school-related skills, but viewing at age 5 or 6 had little effect on achievement at age 7 [f1]. Sesame Street is designed for preschool children; it does not meet as well the developmental needs of older children.

Goal-specific. The single most critical characteristic that defines informative and educational programming and distinguishes it from entertainment programming is the producer's intent as indicated by the adoption of specific educational goals and a program of formative research to monitor how well they are being met before the program's concept is fully developed; before any pilot scripts are written; and before marketing of the series begins. The use of educational and child-developmental research literature and consultants

is part of that process. Field testing of new segments, not just for audience appeal, attention, and popularity, but for effectiveness in communicating new understandings to chidren, is an essential part of any successful informative or educational series [f7].

C. Duration and format.

Duration of program. We support the proposal that the majority of the programming meeting the requirement should be of substantial length. Programs of 15 to 30 minutes not only provide more content than short segments, but a theme can be introduced, developed and elaborated. One early study of the impact of nutritional messages compared the effects of viewing 9 minutes of public service announcements with a 24-minute story. The story was considerably more effective in reducing children's choice of sugared foods [f8].

For children older than about 5 or 6, programs with story continuity are more interesting and more effective in communicating educational messages than magazine programs that move quickly from one idea to another [f9]. Formative research for the educational program, Freestyle, indicated that the target age group (4th through 6th graders) were more interested and learned more from a story format than from a disconnected magazine format [f10].

We would support the use of some short segments, however, because they can be effective in teaching certain kinds of information. School House Rock was a set of brief educational inserts broadcast in the 1970s. In the early 1990s, college students who

reported watching School House Rock recalled the Preamble to the Constitution (one of the items taught) better than infrequent viewers [f11] The use of song and rhyme appears to be particularly effective for rote memory tasks

If short segments are allowed as one means of meeting the educational requirements of the Children's Television Act, they should be repeated. For example, segments lasting less than 5 minutes would be repeated four times Placing such segments in a series like School House Rock may also make them more effective because the common introduction and format becomes familiar to children. The format serves as a cue that interesting content is to follow.

D. A Minimum Time Requirement

We strongly support establishing a minimum time of at least three hours per week with a gradual increase to five hours. The history of children's television in the United States makes it clear that market forces do not lead commercial stations to produce and broadcast educational and informational programming for children. The investigations by the Federal Communication Commission in the 1970s identified as a problem the dearth of educational programs for children, but some optimism was expressed that market forces and industry self-regulation might solve the problem. They did not. When deregulation took place in the early 1980s, the informational programming for children on network stations dropped to near-zero [f12]. At the same time, product-related programming flourished. Because product-related programming is effectively subsidized by advertisers,

it is inexpensive to stations. Educational programs that are independently produced have little chance of competing.

The inability of the marketplace to generate educational and informational children's programs was one of the major reasons for the passage of the Children's Television Act of 1990. Effective regulation is needed to induce commercial stations to serve the educational and informational needs of their child viewers. The cost to the broadcaster of not meeting children's needs for those stations which cannot or will not do so on their own should include good-faith efforts to enhance children's viewing of those educational programs underwritten by the broadcaster on other stations.

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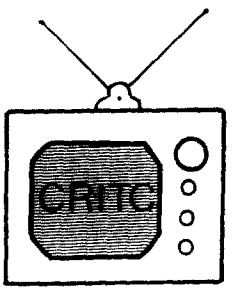

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WHAT IS CRITC?

CRITC is the acronym for the Center for Research on the Influences of Television on Children, a unit within the Department of Human Development of the University of Kansas at Lawrence. Founded in 1978 by its Co-Directors, John C. Wright and Aletha C. Huston, CRITC has published more than a hundred scientific and scholarly articles and chapters. Several thousand children and families have participated in its ongoing research studies. More than two and a half million dollars have been awarded to CRITC in grants and contracts with governmental agencies and private foundations.

CRITC is a research center devoted to conducting studies of how children interact with television, the activity that occupies more of their waking hours than any other. Our goals are to add scientific knowledge about children's development, and to find ways to use the medium to teach children and enrich their lives.

WHAT IS ITS RESEARCH FOCUS ?

Formal features of TV.

Many investigations have concerned how attributes of television such as animation or sound effects influence children's attention, comprehension, aggression, and positive social behavior.

Home Viewing Patterns of Young Children.

Two longitudinal studies have been conducted following children from ages 2 to 7. They have demonstrated that what children watch is more important than how much. Educational programs can teach both academic and social skills. We are currently recontacting 15 to 18-year-olds who participated in one of these studies in the 1980's.

Fiction and Reality on Television.

Between the ages of 6 and 12, children gain an appreciation of what is real and what is fiction; they learn more from "real" programs, but they also absorb a lot of information about life from fiction. We are currently investigating children's reactions to "reality" programs that blend real events with production features usually used with fiction.

Scientific Logic and Reasoning.

A fourth area is concerned with how the auditory and visual production features of instructional television can best be used to demonstrate the logic of physical laws governing the interaction of two variables to produce an outcome. The goal is to present science and math concepts by using visualization more than words and symbols.

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CENTER FOR RESEARCH ON THE INFLUENCES OF TELEVISION ON CHILDREN

Directors: Professors John C. Wright and Aletha C. Huston

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Reprints available from: CRITC, Department of Human Development, 4001 Dole Hall, University of Kansas, Lawrence KS 66045-2133 USA

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